

BROWN AND SEELYE PLLC
Ellen Ann Brown Esq.
Susan H. Seelye Esq.
744 South Fawcett Ave
Tacoma, WA 98402
Telephone 253-573-1958
Facsimile 253-274-1200

HONORABLE MARY JO HESTON
HEARING DATE: January 23, 2020
TIME: 1:00 pm
RESPONSE DATE: January 16, 2020
Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT COURT OF WASHINGTON**

Re

**TRAVIS LIBERTY MCGEE
MARILYN CHRISTINE MCGEE**

Debtor(s)

**In Chapter 13 Proceeding
No. 17-44141-MJH**

RESPONSE TO MOTION TO DISMISS

COMES NOW the above-referenced debtor(s) through their attorneys of record and responds to the Motion to Dismiss by the Trustee as follows:

1. Debtor has been out of work due to an injury and has been unable to make his plan payment.
2. Debtor will return to the doctor on 1/8/20 and will hopefully be cleared to return to work on that date.
3. Debtors request that this matter be continued to the 2/20/20 calendar in order to give the Debtor an opportunity to be back at work and modify the Plan to cure the arrears.

Dated January 6, 2020

/s/ Ellen Ann Brown

ELLEN ANN BROWN WSB#27992
Attorneys for Debtor(s)